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HAZARDOUS WASTE GENERATORS

Anyone who stores, transports, or disposes of certain quantities of hazardous wastes is a hazardous waste generator and must obtain an EPA identification number. (see Pesticide Quarterly No. 8).

Hazardous substances, including some pesticides, are not considered "wastes", until we intend to dispose of them. In the case of a spill or other unanticipated event, a pesticide user could immediately, and unexpectedly become a hazardous waste generator and be required to obtain an EPA identification number.

EPA has set up a special procedure for quickly issuing identification numbers for emergencies or other unusual circumstances. A generator or transportor involved in such circumstances may telephone his EPA Regional Office for a provisional number. These numbers can be given orally by the EPA Regional offices. Further details about the procedure are provided in the Federal Register for Wednesday, December 24, 1980.

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In order to protect human health and the environment from indiscriminate and criminal dumping, EPA plans to control hazardous wastes all the way from the point of generation to their ultimate disposal site. The key to this type of control is a document called a "shipping manifest"; and it must be prepared before transporting hazardous wastes for off-site treatment, storage, or disposal.

The manifest must contain specific information such as a description of the waste and names, addresses, telephone numbers, and EPA identification numbers of the generator, transporter, and disposal facility. The document must also be signed by the generator, transporter, and operator of the disposal facility.

Details about manifest documents, recordkeeping, and reporting are explained in the Federal Register for Monday, May 19, 1980. Information can also be obtained from EPA Regional Offices, or you can contact the S&PF pesticide specialist for Forest Pest Management in Broomall.

ADVISORY OPINIONS AND PESTICIDE RECOMENDATIONS

EPA is still working on its Advisory Opinion which will allow us to use pesticides at dilution rates less than specified by labeling (higher concentrations). Higher concentrations, as applied by low volume (LV) and ultra low volume (ULV) equipment, offers various advantages over other methods of application. EPA plans to allow such use if based on a written or published recommendation from an Agricultural Extension Service or appropriate local, state, or federal government agency (see Pesticide Quarterly No. 7).

According to EPA's latest draft, persons or organizations who make recommendations are WARNED that under state law they may be found liable for civil damages to persons who suffer harm as a result of their recommendations. More specifically, EPA says before issuing a recommendation under the Advisory Opinion, it would be prudent to make an evaluation to determine if it would result in (1) an unreasonable increase in risk to applicators, workers, or bystanders, (2) an unreasonable increase in risk of phytotoxicity to the target crop or nearby sensitive crops; (3) an unreasonable increase in risk to non-target organisms, including birds, fish, wildlife, bees, and beneficial insects; (4) pesticide residues in excess of established tolerances for agricultural commodities.

The significance of EPA's draft opinion is that it does not exempt one from State law nor does it exempt one from the responsibility of making sound recommendations.

NO RPAR FOR CARBARYL

EPA decided not to issue a Rebuttable Presumption Against Registration (RPAR) for carbaryl. The pesticide has been returned to its normal registration status.

EPA reviewed carbaryl because there is concern over two studies which found it teratogenic when administered in low doses to pregnant dogs. There is also concern that carbaryl causes tumors, genetic damage, nervous disorders, and viral inhanacement.

Based on the weight of evidence currently available, EPA concluded that carbaryl, when used properly, does not present a human health hazard. Carbaryl was returned to registration with stipulations: (1) that additional teratogenicity and fetotoxicity studies be conducted in dogs; and (2) that appropriate label changes be made to ensure exposure is minimized.

EPA CONCLUDES RPAR ON DIMETHOATE

EPA recently concluded the RPAR process for dimethoate. Dimethoate is a systemic insecticide sold under various trade names such as Cygon, De Fend, and Rebelate. It is used in forest seed orchards and nurseries and on ornamentals to control aphids, mites, scales, bagworms, tip moths and other important insects.

Based on the Dimethoate Position Document 4, which appears in the January 19, 1981 Federal Register, EPA intends to cancel all registrations of the insecticide unless manufacturers modify their labels requiring that all applicators wear certain protective clothing and equipment. EPA also intends to deny the registrations of all dimethoate products for use in dust formulations.

EPA PROPOSES TO CANCEL SOME USES OF EDB.

An RPAR was issued in 1977 for pesticide products containing ethylene dibromide (EDB). The RPAR was based on EPA's determination that the fumigant causes cancer, genetic damage, and reproductive disorders in laboratory test animals.

Now EPA proposes to cancel several uses of EDB including its use as a fumigant for felled logs to control bark beetles. Its use for preplant fumigation of soil will continue to be allowed subject to certain label modifications and data requirements (see EDB Position Document 4, Federal Register December 10, 1980).

2,4-D AND DIOXINS

Agriculture Canada is taking action to ban production of some 2,4-D products. The action is based on findings that some 2,4-D products are contaminated with dioxins - not the highly toxic 2,3,7,8 TCDD isomer found in 2,4,5-T. (See Pesticide Quarterly No. 9).

According to a weekly report prepared by the U.S. EPA's Office of Pesticides and Toxic Substances, there is a significant difference between 2,4-D products sold and manufactured in the U.S. and in Canada. Products tested from the U.S. market-place are either free of dioxins or contain them at extremely low levels (less than 100 ppb.) and do not pose a hazard. According to the EPA report there is no justification for regulatory action to change current uses of 2,4-D products in the U.S.

EPA will continue its activities to sample and assess the safety of 2,4-D.

CAST REPORTS

The Council for Agricultural Science and Technology (CAST) in preparing a report on the aerial application of pesticides. The report will address the biological responses of non-target organisms, including people, to pesticides sprayed on crops.

The decision to prepare the report was made by CAST's Board of Directors as a result of a number of factors, one of which was a recent petition filed with EPA by the Friends of the Earth. The petition emphasized aerial application and the right of people not to be exposed to pesticides.

Instructions to the responsible CAST task force members said the report should be accurate and objective and should not contain recommendations or promote or oppose policies except on the basis of scientific validity.

CAST is an educational, non lobbying organization that takes no policy position on matters addressed by task forces.

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CAST Report 86, "Social and Economic Impacts of Restricting Pesticide Use in Agriculture". According to a National Forest Products Association newsletter this CAST report presents a procedure for scientifically evaluating the benefits and costs of continuing use of a pesticide in light of public concern about the hazards of pest control. Copies are available from CAST headquarters, 250 Memorial Union, Ames, Iowa 50011.

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